

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL AND SHELLIE GILMOR, <u>et al.</u> ,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 4:10-cv-00189-ODS
)	
PREFERRED CREDIT CORPORATION, <u>et al.</u> ,)	
)	
Defendants.)	
)	

**MOTION OF LASALLE NATIONAL BANK FOR LEAVE TO FILE SUGGESTIONS IN
OPPOSITION TO PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT
IN EXCESS OF PAGE LIMITATION**

Defendant Bank of America, N.A., as successor by merger to LaSalle National Bank in its capacity as former trustee for Impac CMB Trust Series 1999-1 ("LaSalle"), through counsel, respectfully moves this Court for leave to file suggestions in opposition to Plaintiffs' motion for partial summary judgment in excess of the page limit set forth in Local Rule 7.0(f). In support of this request, LaSalle states as follows:

1. Local Rule 7.0(f) permits a party to file suggestions in support of or in opposition to motions in excess of 15 pages with "permission of the Court." Pursuant to this Rule, LaSalle seeks leave to file suggestions in opposition to Plaintiffs' motion for partial summary judgment, not to exceed 30 pages, exclusive of factual presentation.

2. LaSalle submits that good cause exists for this request. This case raises several complex issues, and substantial discovery has occurred since this case was filed. LaSalle intends to streamline its presentation by minimizing duplication with other oppositions being filed, but nevertheless wishes to present several issues for consideration by the Court.

3. This motion is not made for the purpose of delay or harassment, and no party will be prejudiced if the motion is granted.

4. LaSalle has contacted counsel for Plaintiffs, who do not oppose the requested relief.

WHEREFORE, LaSalle respectfully requests that the Court grant leave to file suggestions in opposition to Plaintiffs' motion for partial summary judgment of not more than 30 pages, exclusive of factual discussion.

Respectfully submitted,

September 20, 2012

/s/ Barry L. Pickens

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successor by merger to LaSalle National Bank, in
its capacity as former indenture trustee of
terminated trust Impac CMB Trust Series 1999-1*

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2012, the foregoing was filed using the Court's CM/ECF system, which will notify all registered parties of the filing.

/s/ Daniel J. Tobin _____

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